

Sir Enough is Enough after numerous attempts To seek Discovery once again a Strategy to play with The Courts and The plaintiffs preparation for trial is what is taking place Detering from producing what has Been Discussed and ordered. I move The Court respectfully to make judgement for The plaintiff and place judgement of The sanctions tort, please Do not allow The trickery to continue. Sir I say to you proper conduct shall fear no Exposure.

furthermore Your Honor If you Review The Dates That The Law Library has provided saying That I was There Those Days! Surely They must Be Discredited; you will see That alot of Dates if you look at a calendar The Dates fall on a weekend. Sir The Law Library has not Been open on a weekend for any inmate Since The institution has Been Built in The Early 70's. That will prove made up Dates. I wrote That To Mr Aaron R Goldstein DAG. No Response. The problem at Hand Still Remains No Compliance To Court ordered Discovery.

- Sir I have complied to give all answers to Depositions clearly, with full detail answering every off the many questions to the Defendants attorney up to Mr Griffiths full standard of approval!! Mr Griffith has tried to deceive me that day as well; Mr Griffith Chosen to send me the wrong day and time in the mail! Therefore I was forced to go with absolutely no records, paper or pen, Mr Griffith replied it was the prisons fault yet indeed it was not! Because all announced visits are planned by staff one week before then printed out on a ledger put on a memo for all inmates to see who is coming to see them and when. Mr Griffith intentionally lied about the date and time!! No one can just pop up. I have evidence of that! But your honor that's not the primary problem although since Mr Griffith trying to use Deception and Defocus to why he wants to ignore answering to Interrogatories and Discovery. Its only fair that I clear the air and state the truth of the matter.

Sir: your Honor please dont allow the Trickery and Deception Be accepted for a Substitute for a Answer from Mr Griffith. To Give a Reply To why The Defendants and Counsel Still Refuses To Comply with Court orders; Holding Back and Violating fully The Discovery process. please Review The SANCTIONS TORT and Make Judgement Ruled for The Plaintiff.

Joseph L. Curry

JOSEPH L. CURRY
PLAINTIFF